

Draft - Site Visit Plan for Onsite Monitoring at the Denka Performance Elastomer Facility in LaPlace, Louisiana

Introduction

As part of the site selection process for onsite monitoring at the Denka Performance Elastomer Facility in LaPlace, Louisiana, members of the EPA Office of compliance and Enforcement (OECA) project team will visit the study area to perform a pre-site survey. This pre-site survey will occur March 19-20, 2019. During this pre-site survey, in general terms, members of the project team will:

- Become familiar with the layout of the area,
- Visit the emission sources,
- Visit each potential monitoring location,
- Determine all needs associated with installing and operating the monitoring systems (i.e., accessibility, availability of sampling shelters, adequate power, physical constraints, compatibility with equipment specifications, and special materials needed) prior to deployment.

Siting

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Project Considerations

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Figure 1. Pontchartrain Works Site hosting Denka's Neoprene Facility

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[MSY] NEW ORLEANS/MOISANT
Windrose Plot [All Year]
Period of Record: 01 May 2018 - 31 May 2018

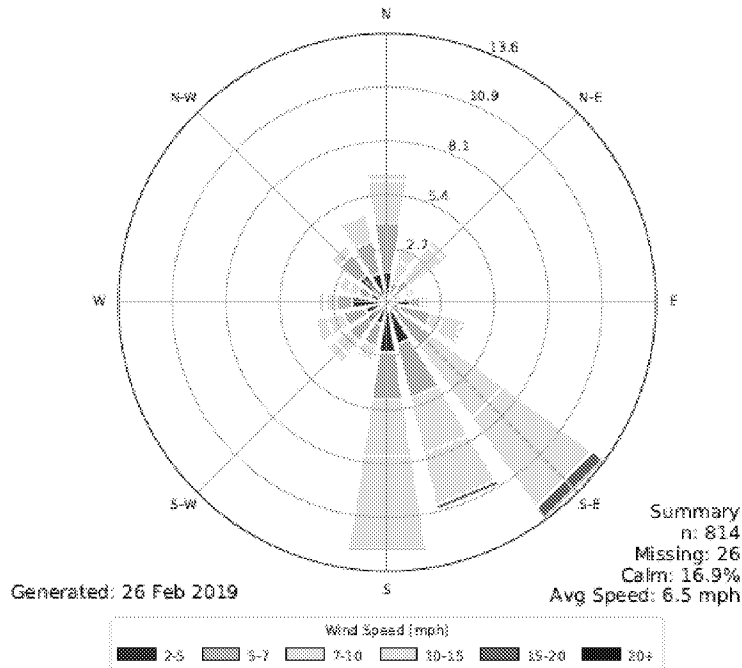


Figure 2. Seasonal Wind Rose for May of 2018, for Louisiana ASOS at MSY Airport (Iowa State University – Iowa Environmental Mesonet website).

Training

Bill Squire-Squier of EPA NEIC to provide input for the plan about the training he will provide. Bill Squire-Squier from NEIC will provide training for sampling contractors, and any Region 5, Region 6, or OECA EPA staff, as applicable. Bill will guide project team members on SPOD deployment considerations, siting and anchoring of equipment, setting up an SPOD, setting up a clean evacuated canister, retrieving triggered canister samples, maintaining sample chain of custody, swapping out SD cards, photoionization detector (PID) sensor bump testing, and troubleshooting. Training will be documented, as per the quality assurance project plan (QAPP), *QAPP for Office of Enforcement and Compliance Assurance (OECA) Onsite Monitoring at the Denka Performance Elastomer Facility in LaPlace, Louisiana*. Some of this training may be repeated during the May deployment.

Meet with the Company

During the site visit, the project team members will meet with the representatives from the Denka facility, at which time they will provide the company with additional details regarding the proposed deployment plan, proposed SPOD, base station deployment locations.

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Project team member ~~has~~ will discuss the option of providing the company the opportunity to operate the Sensit SPOD at the meeting. If the company agrees, the Sensit SPOD will be deployed and the company will accept control of it, operate it and use it for split sample purposes over the duration of the project. If the company agrees to take control of the Sensit SPOD, their input will be a primary driver for its location selection. Bill ~~Squire~~ Squier from EPA NEIC will provide training on the Sensit SPOD to the company. Some of this training may be repeated during the May deployment.

Quality

The *QAPP for Office of Enforcement and Compliance Assurance (OECA) Process Area Onsite Monitoring at the Denka Performance Elastomer Facility in LaPlace, Louisiana* provides quality details for May deployment. The following are quality elements from the QAPP that pertain to the Sensit SPOD.

The Sensit SPOD is deployed at a location with the siting considerations discussed in the siting section of this document to minimize interferences and obstructions of operation. Any SPOD maintenance must be handled by trained personnel.

For the Sensit SPOD, an isobutylene bump test will be performed on the SPOD PID sensor prior to deployment to the company. Further isobutylene bump testing will occur at the start of the May deployment.

Data are stored on the SPOD SD card and in the case of the Sensit SPOD, can be automatically uploaded to a secure server operated by Sensit that is available through a password protected, web-based interface. Data should be inspected frequently to determine proper SPOD operation. The Sensit SPOD data and canister sample trigger parameters can be accessed locally with a laptop and USB cable. SPOD data are collected continuously and automatically at a rate of 0.5 to 1 hertz (Hz) beginning at startup. The data from the SPOD includes:

- date/time stamp,
- non-speciated volatile organic compound by PID (counts),
- 3-D wind field (u, v, w, SOS, 3D temp.),
- atmospheric pressure (kilopascal),
- temperature (°Celsius), and
- relative humidity (percent, %).

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